

# Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42<sup>nd</sup> Street, Suite 2020  
New York, New York 10165

Telephone: (212) 317-1200  
Facsimile: (212) 317-1620

September 24, 2020

**Via ECF**

Honorable Lorna G. Schofield.  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Caballero de la Cruz et al v. Pastrami Prince Inc. et al  
20-cv-4643**

Dear Judge Schofield:

I represent Plaintiffs in the above referenced matter and submit this letter to request an adjournment of the Initial Conference, which is set for October 1 at 10:50 A.M. This is the second request of its kind. The first request was granted because Plaintiffs had not completed service on all Defendants. The reason for this current request is that having been served, all Defendants are now in default and Plaintiffs have had no communication with any of them. Clerk's Certificates of Default were requested and issued earlier today, September 24, 2020.

Plaintiffs thus respectfully request that the initial conference be adjourned *sine die* pending Plaintiffs' contemplated Motion for Default Judgment.

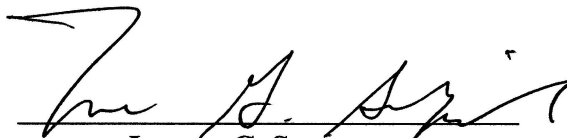
/s/ Clela Errington  
Clela A. Errington, Esq.

The initial pretrial conference scheduled for October 1, 2020, is adjourned to **October 29, 2020, 10:50 a.m.**

Plaintiffs shall file their default judgment materials in accordance with the Individual Rules, Attachment A, by **October 9, 2020.**

Plaintiffs shall serve a copy of this Order on Defendants and file affidavits of service no later than **October 2, 2020.**

Dated: September 25, 2020  
New York, New York

  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

*Certified as a minority-owned business in the State of New York*